

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED
8/14/24 2:51 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

In Re:)	Bankruptcy No. 22-22257 GLT
)	
Sandra Lee Plovic)	
)	Chapter 13
Debtor(s).)	
)	
Sandra Lee Plovic)	
Movant(s),)	Related to Doc. No. 3/7
vs.)	
)	
Ronda J. Winnecour, Trustee)	Hearing:
Respondent(s))	

CONSENT ORDER

It is hereby agreed, by and among the Debtor, Sandra Lee Plovic, Scott R. Lowden, Esquire, counsel for the Debtor(s), and Ronda Winnecour, Chapter 13 Trustee as follows:

1. The Debtor filed an amended Schedule "B" that added a "lump sum received from National Guard pension fund" to the assets of the Debtor in the amount of \$30,048.00 at DN 36 filed on July 11, 2024.
2. Additionally, at DN 36, the Debtor provided for an exemption of the property under Me. Rev. Stat. Ann. title 14 Section 4422(15) in the amount of \$500.00 along with an exemption under Me. Rev. Ann title 14 Section 4422(13)(E) in the amount of \$29,548.00. The Trustee has questioned whether full amount of distribution would be exempt under applicable law.
3. To avoid the costs and expenses of litigating an objection to the claimed exemption, the parties (consisting of the Debtor and Trustee, have agreed to resolve, in

accordance with this Order, any and all issues regarding the extent of the exemptions available related to the “lump sum received from National Guard pension fund”.

4. The parties agree that the Debtor shall forward to the Trustee a lump sum amount of \$15,024.00 in resolution of this matter.

5. The \$15,024.00 to be paid to the Trustee shall be treated as additional plan funding and shall be earmarked, after deduction for the Trustee fees on that sum, for distribution to unsecured creditors. The parties agree that pursuant to 11 U.S.C. §349(b), notwithstanding a subsequent dismissal of this Chapter 13 case, title to the \$15,024.00 proceeds, to the extent not previously distributed, shall remain in the Bankruptcy Estate, and jurisdiction over those proceeds shall remain in the Bankruptcy Court. The Trustee shall be authorized, as soon as practical after the entry of a dismissal Order, to distribute the proceeds in accordance with the terms of this Agreement to unsecured creditors.

6. This Agreement shall be incorporated into, and become part of, the Debtor’s Chapter 13 Plan dated November 15, 2022 at DN 6, and confirmed on December 13, 2022 by Order at DN 22.

Prepared by: Scott R. Lowden and Owen W. Katz

So ORDERED, this 14TH, day of August, 2024.



U.S. Bankruptcy Judge ^{hct}

Consented to:

/s/ Scott R. Lowden
Scott R. Lowden, Esquire
PA ID 72116
100 Heathmore Ave.
Pittsburgh, PA 15227
lowdenscott@gmail.com
(412) 292-4254
Attorney for Debtor

/s/ Owen W. Katz
Owen W. Katz, PA I.D. 36473
Office of the Chapter 13 Trustee
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Pittsburgh, PA 15219
(412) 471-5566
Email: okatz@chapter13trusteewdpa.com
Attorney for Chapter 13 Trustee

In re:
Sandra Lee Plovic
Debtor

Case No. 22-22257-GLT
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Aug 14, 2024

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 16, 2024:

Recip ID	Recipient Name and Address
db	+ Sandra Lee Plovic, 1494 Route 136, Washington, PA 15301-3191

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 16, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 14, 2024 at the address(es) listed below:

Name	Email Address
David A. Rice	on behalf of Debtor Sandra Lee Plovic ricelaw1@verizon.net lowdenscott@gmail.com
Denise Carlon	on behalf of Creditor PENNYMAC LOAN SERVICES LLC dcarlon@kmlawgroup.com
Office of the United States Trustee	ustregion03.pi.ecf@usdoj.gov
Ronda J. Winnecour	cmecf@chapter13trusteedpa.com
Scott R. Lowden	on behalf of Debtor Sandra Lee Plovic lowdenscott@gmail.com
Stephen Russell Franks	on behalf of Creditor JPMorgan Chase Bank N.A. amps@manleydeas.com

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User: auto

Page 2 of 2

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Form ID: pdf900

Total Noticed: 1

William E. Craig

on behalf of Creditor Americredit Financial Services Inc. dba GM Financial wcraig@egalawfirm.com,
mhazlett@mortoncraig.com;mortoncraigecef@gmail.com

TOTAL: 7